

REMARKS

Applicants respectfully request reconsideration of the present application in view of the reasons that follow.

No claims are currently being amended. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier. Claims 1-11 are pending in this application.

Rejection under 35 U.S.C. § 103

Claims 1-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over alleged applicant admitted prior art on pages 1-3 of the specification ("AAPA") in view of U.S. Patent 6,175,295 to Honma ("Honma"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1 is directed to a sensor device comprising "a coated electric wire wound around a detection circuit in a planar manner so as to electrostatically shield the detection circuit, wherein the electric wire is coated with an insulating material." Neither the AAPA nor Honma suggest this feature of claim 1, nor the advantages attendant thereto.

The Office Action acknowledges that the AAPA does not disclose "a coated electric wire wound around a detection circuit in a planar manner" stating on page 3, "Applicant's admitted prior art does not disclose . . . that the wire is wound in a planar manner." The Office Action further states, however, that it would have been obvious to a person of ordinary skill in the art to have wound the wire in a planar manner. Applicants respectfully disagree.

The shape of the winding of the wound electric wire in claim 1 is more than a mere design choice, but provides functional features to the winding and advantages thereby. By winding with the coated wire in a planar manner as in claim 1, the electrostatic shield may be formed with a flexibility and ease (See present specification on pages 25 and 26, for example, suggesting a number of advantages) not suggested by the AAPA.

It is improper hindsight reconstruction to modify the AAPA to arrive at the invention of claim 1 using applicants' own disclosure. It is black letter law that the Patent Office may not use applicants' own disclosure to provide motivation for arriving at applicant's claimed invention.

The Office Action cites to *In re Dailey* 357 F.2d 669, 149 USPQ 47 (CCPA 1966) for the proposition that changing the form/shape of an invention involves only routine skill in the art. Applicants submit that *In re Dailey* is not on point with respect to the facts of this application. The shape of the wire winding in the invention of claim 1 provides significant advantages over the AAPA as discussed above. These advantages must be considered when considering the invention of claim 1 as a whole in any proper obviousness analysis. For at least this reason, claim 1 is patentable over the AAPA.

Honma does not cure the deficiencies of the AAPA. Honma was cited for disclosing a triple layered insulating wire, but does not suggest that the AAPA should include wire wound around a detection circuit in a planar manner. Thus, even if the AAPA and Honma were combined, the result would not meet all the limitations of claim 1.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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